

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DISTRICT

RBS CITIZENS, N.A. d/b/a	)	
CHARTER ONE BANK, a National	)	
Banking Association,	)	
	)	Case No. 1:10-cv-00769
Plaintiff,	)	Hon. Matthew F. Kennelly
	)	
- vs -	)	
	)	
PARTS FIT INDUSTRY CO., an Illinois	)	
corporation, and CHENG LO, an Illinois citizen,	)	
	)	
Defendants.	)	

**PLAINTIFF'S EMERGENCY MOTION  
FOR  
ORDER DIRECTING DEFENDANTS TO SURRENDER COLLATERAL  
TO PLAINTIFF  
OR, IN THE ALTERNATIVE,  
FOR THE APPOINTMENT OF A RECEIVER**

Plaintiff, RBS Citizens, N.A. d/b/a Charter One Bank ("Charter One"), by and through its attorneys, Simon, Galasso & Frantz, LLC, hereby moves this Court for: (i) an order directing the defendants to surrender collateral to the plaintiff, pledged as security for a commercial line of credit now in default, and enjoining the defendants and their directors, officers, agents, representatives, employees, attorneys, and those in active participation or concert with them and those who receive actual or constructive notice of the injunction from selling, leasing, transferring, hiding, concealing, or disposing of the collateral; or, (ii) in the alternative, appointing a receiver over the defendants. This Motion is supported by a Memorandum of Law filed herewith.

Respectfully submitted,

/s/Dean J. Groulx

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Attorneys for Charter One Bank

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